

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KEN JOHANSEN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL GROUP, INC., and
SPANISH QUOTES, INC. d/b/a
WESPEAKINSURANCE,

Defendants,

LIBERTY MUTUAL GROUP, INC.,

Cross-Claimant,

v.

SPANISH QUOTES, INC. d/b/a
WESPEAKINSURANCE,

Cross-Defendant,

LIBERTY MUTUAL GROUP, INC.,
LIBERTY MUTUAL INSURANCE COMPANY,

Third-Party Plaintiffs,

v.

PRECISE LEADS, INC., and
DIGITAS, INC.,

Third-Party Defendants.

CIVIL ACTION
NO. 1:15-cv-12920-ADB

AFFIDAVIT OF LAURA GREENBERG-CHAO

I, Laura Greenberg-Chao, hereby depose and swear as follows:

1. I am an attorney at Henshon Klein LLP and I represent Third-Party Defendant Digitas, Inc. in this matter. I have personal knowledge of the facts set forth in this affidavit.

2. A true copy of certain records produced during discovery and bates-labelled LM00036-00037 is attached as *Exhibit 1*.

3. A true copy of certain records produced during discovery and bates-labelled LM00208-LM000209 is attached as *Exhibit 2*.

4. A true copy of certain records produced during discovery and bates-labelled LM00210-LM000219 is attached as *Exhibit 3*.

5. A true copy of Liberty Mutual's First Set of Interrogatories and Plaintiff's Objections and Answers Thereto is attached as *Exhibit 4*.

6. A true copy of Liberty Mutual's First Set of Requests for Admissions and Plaintiff's Objections and Answers Thereto is attached as *Exhibit 5*.

7. A true copy of Exhibit 5 to the May 26, 2016 Deposition of Plaintiff Kenneth Johansen ("Johansen Dep.") (the transcript of a December 23, 2014 call) is attached as *Exhibit 6*.

8. A true copy of Exhibit 8 to the Johansen Dep. (the transcript of a February 17, 2015 call) is attached as *Exhibit 7*.

9. A true copy of Exhibit 9 to the Johansen Dep. (the transcript of a February 18, 2015 call) is attached as *Exhibit 8*.

10. A true copy of Exhibit 10 to the Johansen Dep. (the transcript of a February 18, 2015 call) is attached as *Exhibit 9*.

11. A true copy of Exhibit 11 to the Johansen Dep. (the transcript of a February 20, 2015 call) is attached as *Exhibit 10*.

12. A true copy of Exhibit 12 to the Johansen Dep. (the transcript of a March 16, 2015 call) is attached as *Exhibit 11*.

13. A true copy of pertinent excerpts from the transcript of the Johansen Dep. is attached as *Exhibit 12*.

14. A true copy of Exhibit 13 to the Johansen Dep. (records of the Franklin County Municipal Court) is attached as *Exhibit 13*.

Duly sworn under the pains and penalties of perjury:

/s/ Laura Greenberg-Chao

Dated: May 8, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 8, 2017.

/s/ Laura Greenberg-Chao